

The Commonwealth of Massachusetts
Executive Office of Health and Human Services
Department of Public Health
William A. Hinton State Laboratory Institute
305 South Street, Jamaica Plain, MA 02130

DEVAL L. PATRICK
GOVERNOR

TIMOTHY P. MURRAY
LIEUTENANT GOVERNOR

JUDYANN BIGBY, MD
SECRETARY

JOHN AUERBACH
COMMISSIONER

Marcia Slingerland, ADA

Essex County District Attorney's Office
By e-mail

October 13, 2011

Re: Comm. v. [REDACTED]

ADA Slingerland,

Please find below a discovery package for the case noted above. The material is collated in the following manner:

- 1) the c.v.'s of the chemists
- 2) the Evidence Office receipt to the Quincy Police
- 3) the inventory control cards
- 4) the Drug Powder Analysis Forms
- 5) the gas chromatography/mass spectrometry (gc/ms) data for the cocaine
- 6) the Pharmaceutical analysis form for the Naloxone

I was the custodial chemist responsible for the chain of custody, weights and the preliminary analysis of the exhibit. Annie Khan ran the gc/ms for the confirmatory analysis.

If you need further clarification of this material, call me directly at (617) 983-6627.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Lawler", written over a horizontal line.

Michael Lawler
Senior Chemist

Cc: Annie Khan

Curriculum Vitae

Michael Lawler

Education:

University of Virginia, Charlottesville, Va. Bachelor of Arts in English, 1975

Harvard University, Cambridge, Ma. Master of Arts in biology, 1995

Experience:

1990-present currently Chemist III, Mass. Dept. of Public Health, Drug Lab analyst determining the identity of unknown substances and providing expert testimony in the Courts. Conduct special testing for poisons within drug exhibits. Lab Safety Officer.

2005-2008 lecturer in chemistry, Curry College, Milton, Ma.

1988-1990 New England Newborn Screening (NENS) Biochemist conducting pilot studies and validation trials of new newborn screening tests. Investigator and co-author of papers noted below. Introduced screening test for Biotinidase Deficiency. Liaison with interstate collaborators in national studies.

1983-1988 Supervised NENS urine screening lab for metabolic disorders. Conducted research in collaboration with Children's Hospital (Boston) detecting neuroblastoma, a cancer of early childhood. Conducted reference testing for rare metabolic disorders for an international audience.

1982-1983 NENS hypothyroid assay technologist with Tuft's University

1979-1981 Mass. Bay Community College, staff technologist preparing materials for the laboratory technician program, which included reagents, apparatus and maintaining stock cultures of human pathogens.

Additional education and special training

Drug Analysis, completed six week training course by senior staff within the Department of Public Health Drug Analysis Laboratory

National Laboratory Network Training Program course as Expert Witness

Qualified as an expert witness in the Massachusetts Courts and the U.S. District Court

Current Drug Trends – Multijurisdictional Drug Task Force Academy

CDC course in antibiotic resistance CDC course in cell culture

CDC course in public health response to bioterrorism

U.S. Army course in biologic warfare and terrorism

Journal Publications

Screening, 1992, 1:34-37; Lawler,M., Frederick,S., Rodriguez-Anza, S., Wolf,B., Levy,H., *Newborn Screening for Biotinidase Deficiency, Pilot Study and Follow-up of Identified Cases*

Genetic Screening, 1990, 11-18, Mitchell,M., Lawler,M., Walraven,C., Hermos,R., *To Screen or Not to Screen for Congenital Hyperplasia: Is that the Question?*

The Journal of Pediatrics, 116: 78-83, Secor-McVoy,J., Lawler,M., Schmidt, M., Ebers,D., Hart,P., Pettit,D., Blitzer,M., Wolf,B., *Partial Biotinidase Deficiency: Clinical and Biochemical Features*

Professional Affiliations

Northeastern Association of Forensic Scientists (NEAFS) since 2005

Awards

Theobald Smith Education Grant for graduate studies

Curriculum Vitae

Annie Khan (Dookhan)

Education:

University of Massachusetts, Boston, Ma, Master of Science in Chemistry.

University of Massachusetts, Boston, Ma, Bachelor of Science in Biochemistry.

Experience:

2003 – present

Chemist I, II, Massachusetts Department of Public Health, Drug Analysis Laboratory

*Completed six-week training course conducted by senior staff within the Department of Public Health, Drug Analysis Laboratory.

*Appointed Assistant Analyst by Assistant Commissioner of Public Health, 2004.

*Responsible for the identification of illicit drugs to determine violations of harmful and narcotic drug laws.

*Trained in the use of complex analytical instrumentation, microscopes and balances for the purpose of drug analysis.

*Maintenance and repairs of all analytical instruments.

*Responsible for the Quality Control of all analytical instruments, reagents and controls/standards.

*Responsible for the Quality Control/Quality Assurance program for the drug lab.

*Notary Public.

*Qualified as an expert witness in Massachusetts Courts and U.S. District Court

2001 – 2003

QC Analyst I, II, UMMS-Massachusetts Biologic Laboratory, QC Material Control

*Completed proficiency training conducted by a member of the staff within the MLB Quality Control and Quality Assurance Department.

*Method Development for creating new techniques and enhancing vaccines for the QC Dept. and FDA.

*Writing, revising and reviewing Standard Operating Procedures (SOPs).

*Trained and supervised new chemists and interns for the department.

*Routine QC testing of products for the FDA.

*Trained in the use of complex analytical instrumentation, and balances for the purpose of QC analysis for product and validation projects.

*Calibration, preventive maintenance, QC and QA of analytical instrumentation.

*Complete testing of chemicals for Vendor Validation Project for the FDA.

*Compendial testing and interpretation of the USP, ACS, FCC, AOAC, Merck Index, PDR, etc.

Additional Training:

Dept. of Justice – Forensics Professionals. (numerous trainings)

GLP/GMP course with Massachusetts Biologic Laboratory.

QC/QA training according to FDA Codes and Regulations.

GC and GC/MS courses with Agilent Technologies and Restek.

HPLC course with Waters Cooperation.

FTIR course with Spectros.

TOC training with MBL and Sievers.

Association:

American Chemical Society (ACS)

Northeastern Association of Forensics Science (NEAFS)

*The Commonwealth of Massachusetts**Executive Office of Health and Human Services**Department of Public Health**State Laboratory Institute*

Boston Drug Laboratory
 Tel (617) 983-6622
 Fax (617) 983-6625

Amherst Drug Laboratory
 Tel (413) 545-2601
 Fax (413) 545-2608

Boston Hours
 8:00 – 11:00
 2:00 – 4:00

Amherst Hours
 9:00 – 12:00
 1:00 – 3:00

DRUG RECEIPT

City or Department: Haverhill Police Department Police Reference No.: _____

Name and Rank of Submitting Officer: Detective *[Signature]* #55

Defendant(s) Name (last, first, initial):
 [REDACTED]

To be completed by Submitter

Description of Items Submitted

To be completed by Lab Personnel

Gross Weight

Lab Number

Bag A contains 2 plastic bags with white rock substance

29.58 gm

Bag B contains 1 broken plastic bag with white rock substance

16.32 gm

Bag C contains 1 vial labelled MAX NALOXONE containing a clear fluid

8.42 gm

Received by: *[Signature]* Date: *4.21.11*

No. [REDACTED] Date Analyzed: 04-28-11
City: Haverhill Police Dep
Officer: Detective Melanson

Def: [REDACTED]
Amount: Subst: SUB
No. Cont: 2 Cont: pb

Date Rec'd: 04/21/2011 No. Analyzed: 2

Gross Wt: 23.580 ✓ Net Wt: 23.35g
#Tests: 14/10/11

Prelim: Cocaine Findings: 11/20/11
Cocaine

No. [REDACTED] Date Analyzed: 04-28-11
City: Haverhill Police Dep
Officer: Detective Melanson

Def: [REDACTED]
Amount: Subst: SUB
No. Cont: 1 Cont: pb

Date Rec'd: 04/21/2011 No. Analyzed:

Gross Wt: 16.320 ✓ Net Wt: 10.38g
#Tests: 7/11/11

Prelim: Cocaine Findings: 2/25/11
Cocaine

No. [REDACTED] Date Analyzed: 4-23-11
City: Haverhill Police Dep
Officer: Detective Melanson

Def: [REDACTED]
Amount: Subst: LIQUID
No. Cont: 1 Cont: Vial ✓

Date Rec'd: 04/21/2011 No. Analyzed:

Gross Wt: 0.420 ✓ Net Wt: 0.11g
#Tests: 1/11/11

11-44
Prelim: Findings: Naloxone class E
RX

GCN 18
G0426113

GCN 18
G0426113

DRUG POWDER ANALYSIS FORM

4-28-11

SAMPLE #

AGENCY

Haverhill

ANALYST

Ma

No. of samples tested:

2

Evidence Wt.

29.58

PHYSICAL DESCRIPTION:

2 pbw/substance

Test #1 sandwich bag w/substance

Test #2 sandwich bag w/substance

net #1 = 10.9680g

net #2 = 12.3880g

23.3560g

Gross Wt (): 12.3514

Gross Wt (): 13.5037

Pkg. Wt:

Net Wt: 23.3560g

OHAUS 2334 4-23-11

20g = 20.0000g

10g = 10.0000g

5g = 4.9999g

1g = 0.9998g

✓ net OK

PRELIMINARY TESTS

Spot Tests

Cobalt Thiocyanate () ⊕ x2
Marquis ⊕
Froehde's ⊕
Mecke's ⊕

Microcrystalline Tests

Gold Chloride ⊕ x2
TLTA () ⊕

OTHER TESTS

PRELIMINARY TEST RESULTS

RESULTS

DATE

GC/MS CONFIRMATORY TEST

RESULTS

MS OPERATOR

DATE

Cocaine

ASD

4-28-11

DRUG POWDER ANALYSIS FORM

4-28-11

SAMPLE #

AGENCY

Haverhill

ANALYST

MSR

No. of samples tested: _____

Evidence Wt.

16.32

PHYSICAL DESCRIPTION:

turn pb with loose substance

Gross Wt (): _____

Gross Wt (): _____

Pkg. Wt: _____

Net Wt: _____

10.3804g

OHAUS 2334 4-23-11

20g = 20.0000g

10g = 10.0000g

5g = 4.9999g

1g = 0.9998g

PRELIMINARY TESTS

Spot Tests

Cobalt Thiocyanate () (+)

Marquis (-)

Froehde's (-)

Mecke's (-)

Microcrystalline Tests

Gold Chloride (+)

TLTA () (+)

OTHER TESTS

PRELIMINARY TEST RESULTS

RESULTS _____

DATE _____

GC/MS CONFIRMATORY TEST

RESULTS cocaine

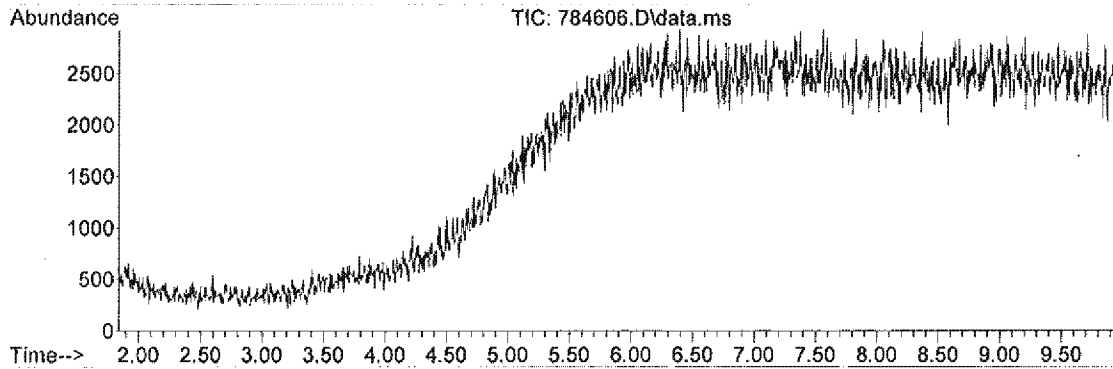
MS OPERATOR ASD

DATE 4-28-11

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784606.D
Operator : ASD
Date Acquired : 26 Apr 2011 10:15
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

✓ ASD
10-1-11



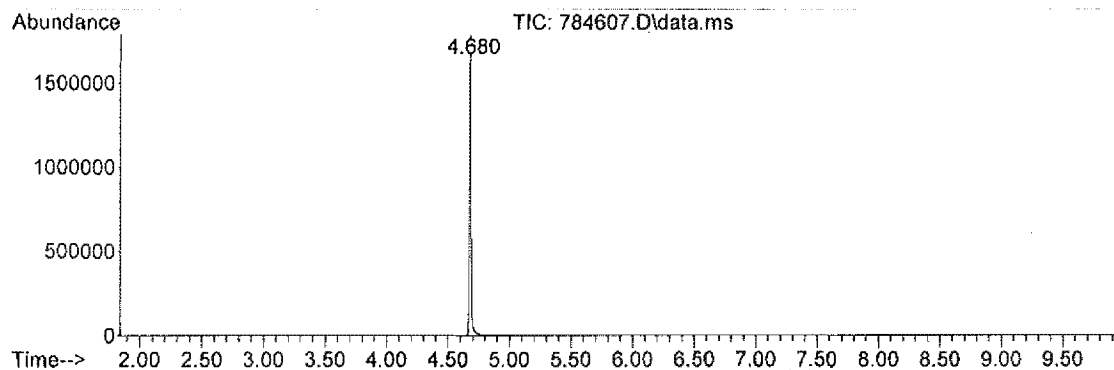
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784607.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 10:28
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 7
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
4.680	1635109	100.00	100.00

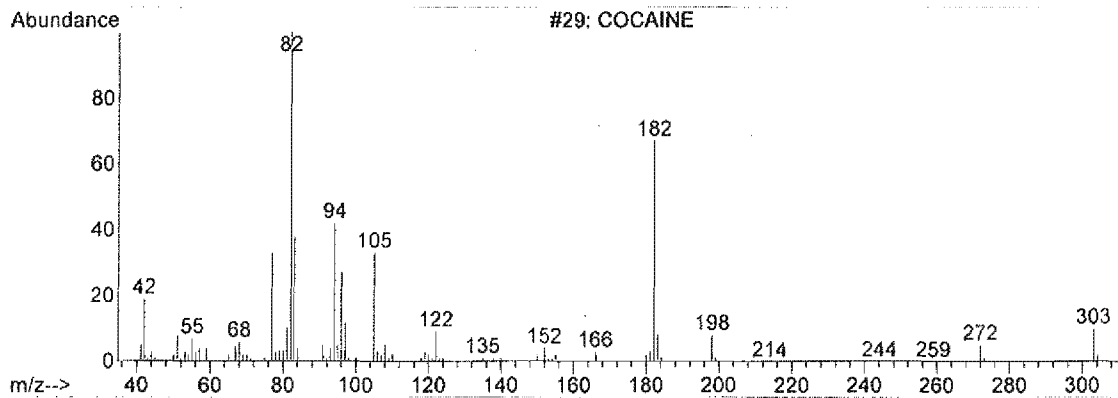
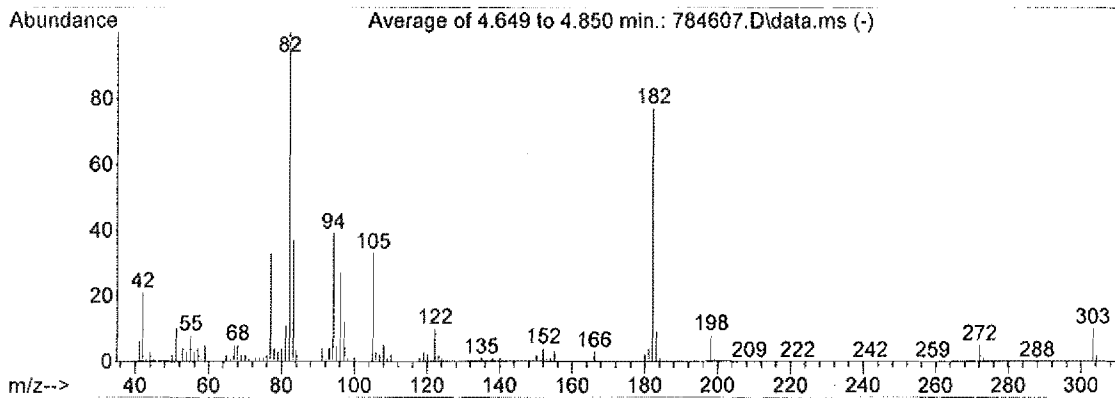
Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784607.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 10:28
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 7
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

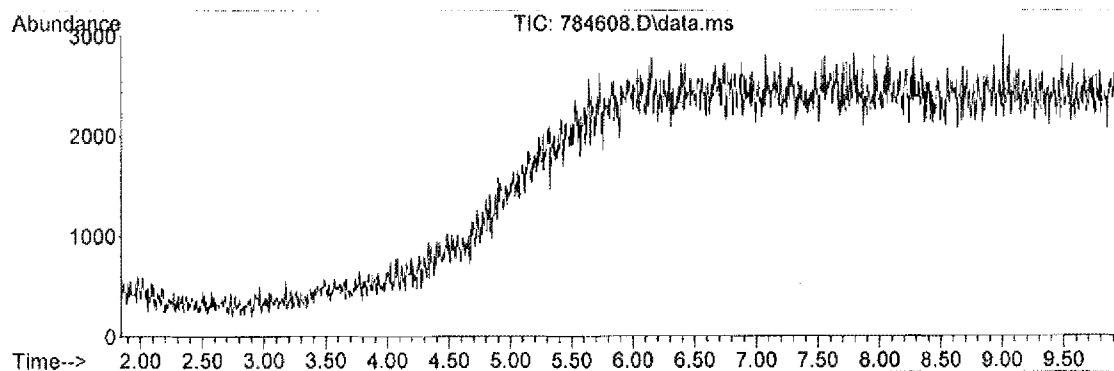
PK#	RT	Library/ID	CAS#	Qual
1	4.68	C:\Database\SLI.L COCAINE	000050-36-2	99



Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784608.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 10:41
 Sample Name : BLANK
 Submitted by : MGL
 Vial Number : 1
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



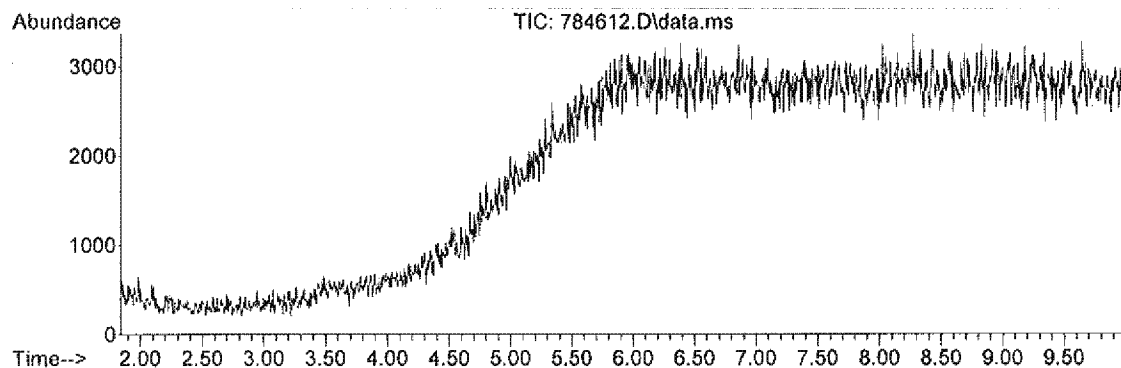
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784612.D
Operator : ASD
Date Acquired : 26 Apr 2011 11:31
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE



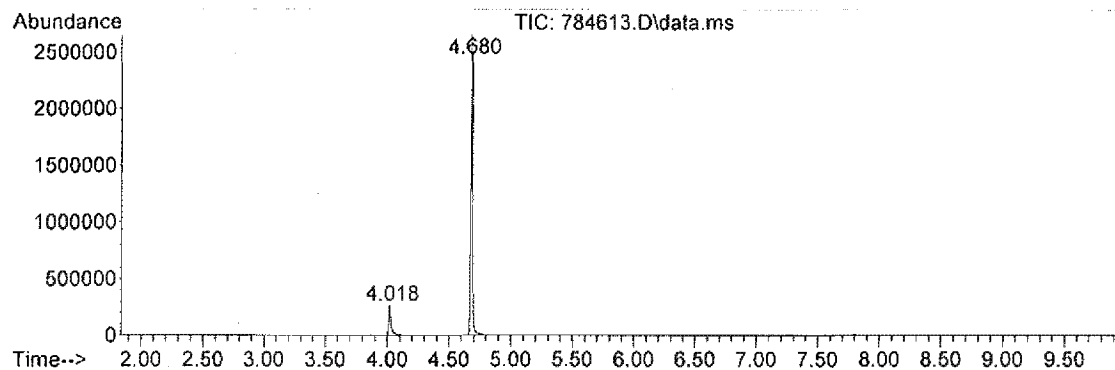
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784613.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 11:43
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 13
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
4.018	363790	11.73	13.29
4.680	2738164	88.27	100.00

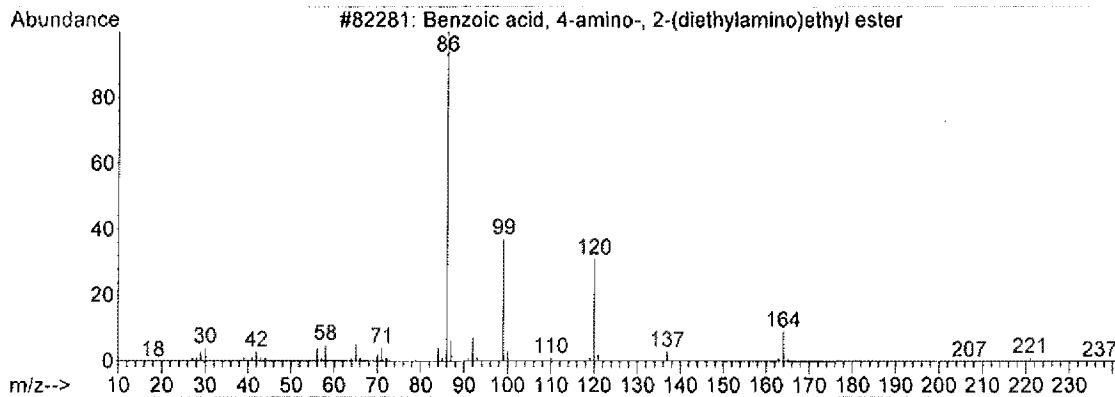
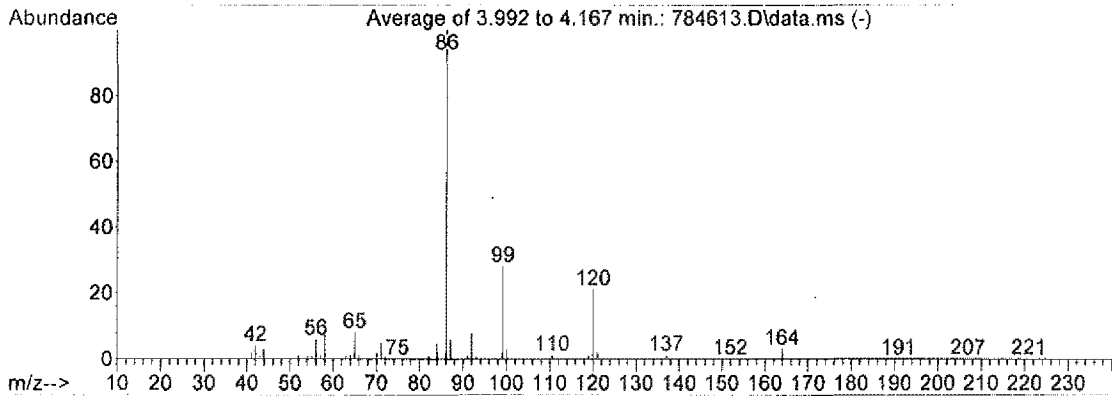
Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784613.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 11:43
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 13
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	4.02	C:\Database\NIST05a.L		
		Benzoic acid, 4-amino-, 2-(diethyla	000059-46-1	90
		Benzamide, 4-amino-N-[2-(diethylami	000051-06-9	64
		3-Aminobenzoic acid, 2-diethylamino	010369-94-5	64



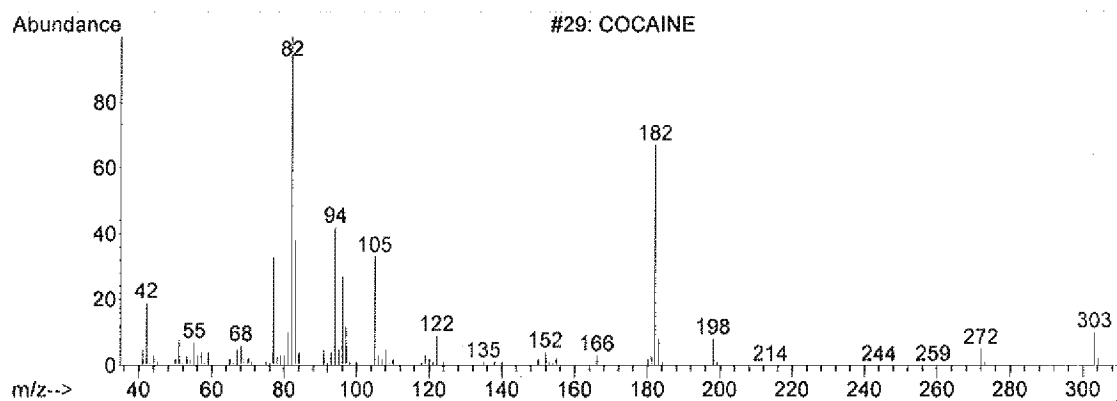
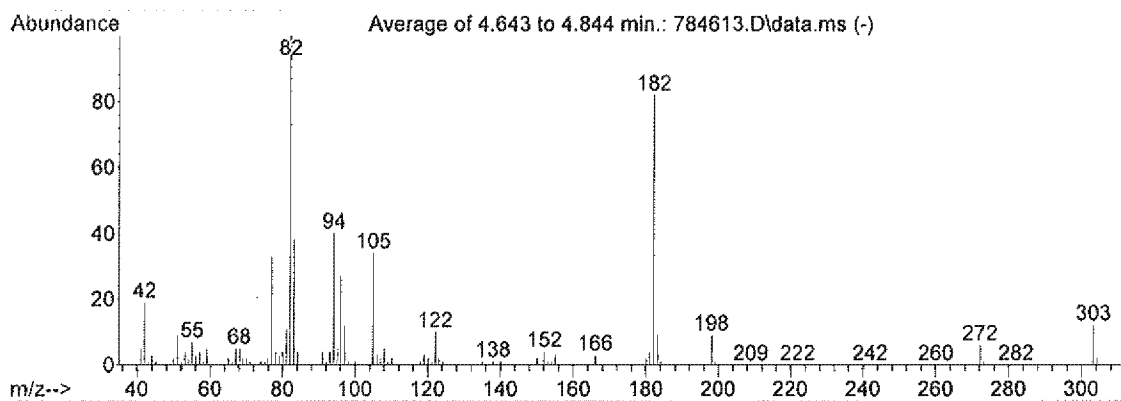
Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784613.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 11:43
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 13
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

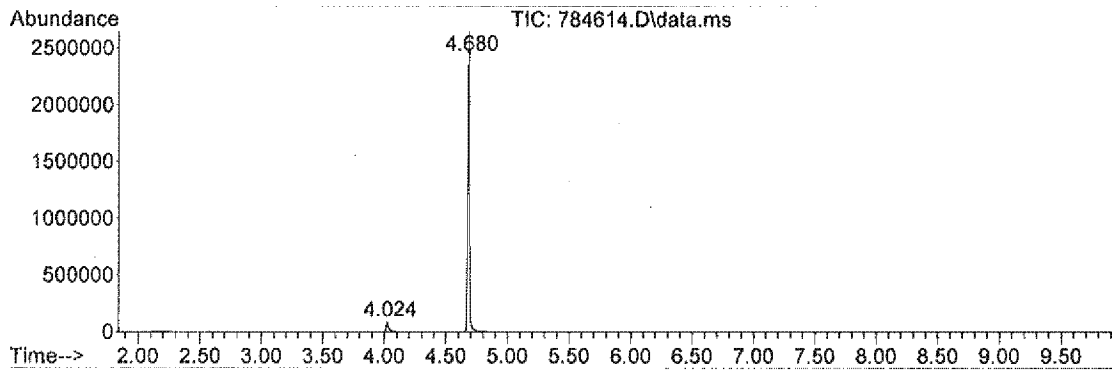
PK#	RT	Library/ID	CAS#	Qual
2	4.68	C:\Database\SLI.L COCAINE	000050-36-2	99



Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784614.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 11:56
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 14
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
4.024	138518	4.79	5.03
4.680	2751112	95.21	100.00

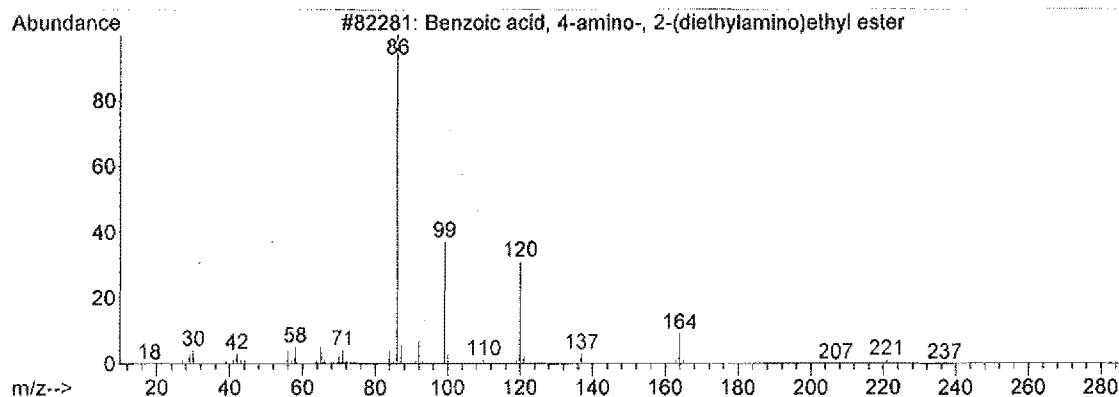
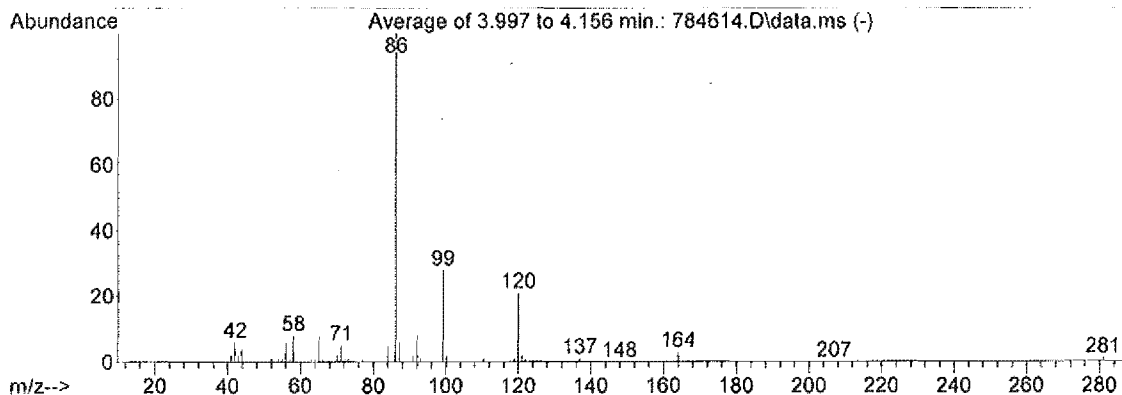
Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784614.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 11:56
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 14
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	4.02	C:\Database\NIST05a.L		
		Benzoic acid, 4-amino-, 2-(diethyla	000059-46-1	83
		Benzamide, 4-amino-N-[2-(diethylami	000051-06-9	64
		Benzoic acid, 4-amino-2-chloro-, 2-	000133-16-4	59



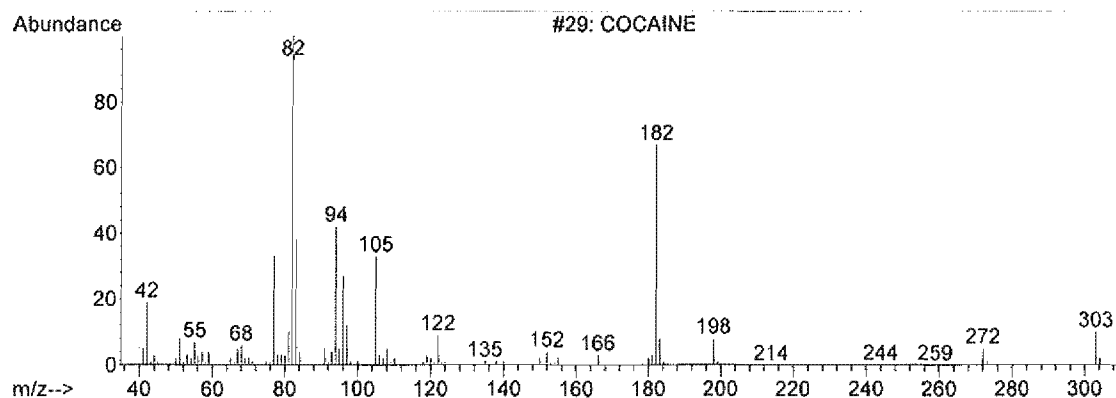
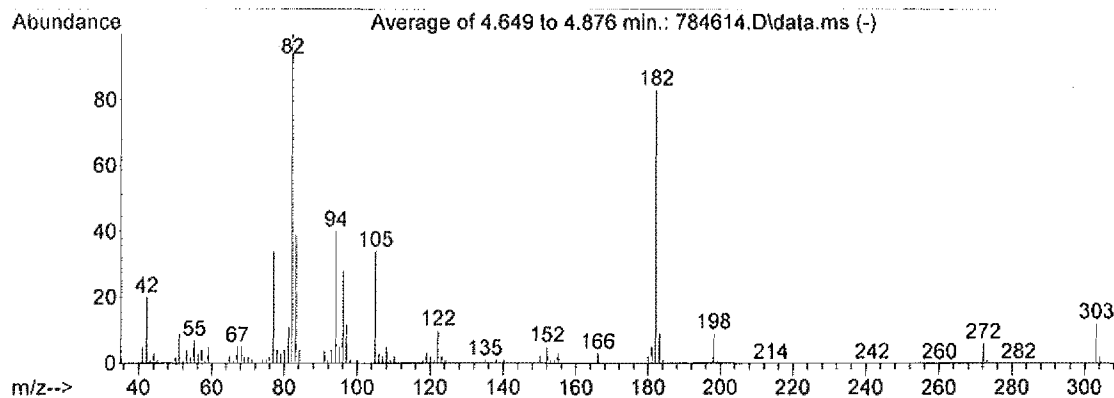
Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784614.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 11:56
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 14
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

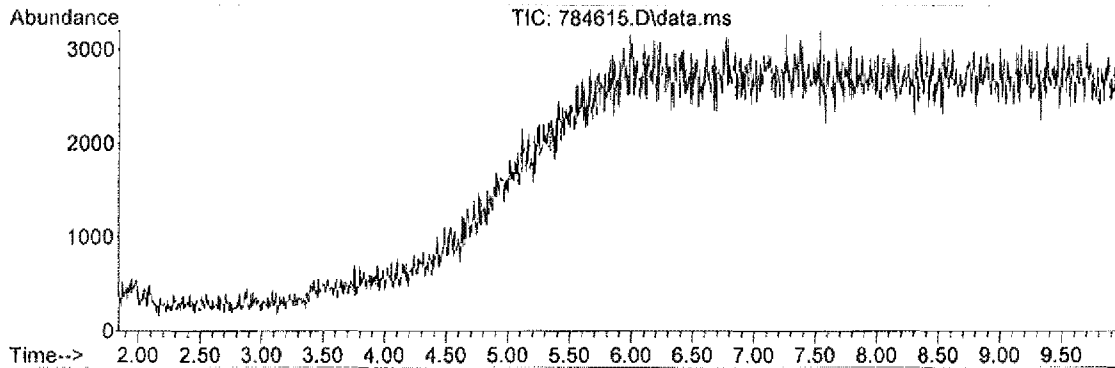
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
2	4.68	C:\Database\SLI.L COCAINE	000050-36-2	99



Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784615.D
Operator : ASD
Date Acquired : 26 Apr 2011 12:09
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

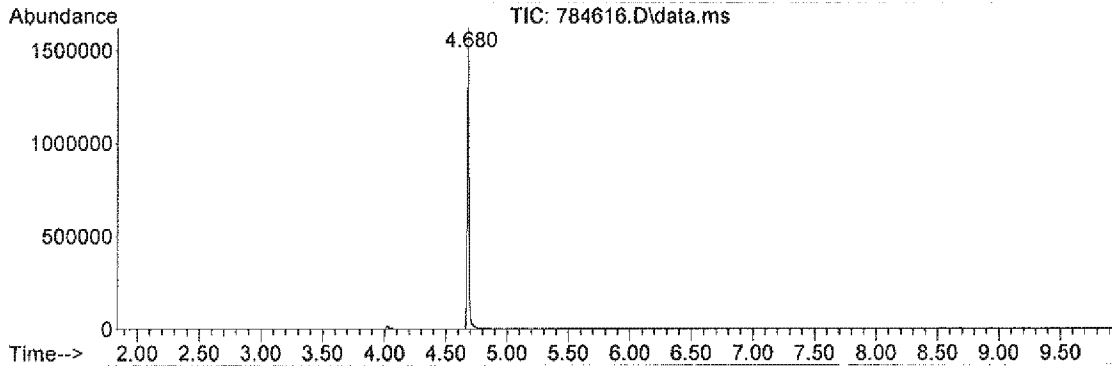


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784616.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 12:21
 Sample Name : XXXXXXXXXX
 Submitted by : MGL
 Vial Number : 16
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



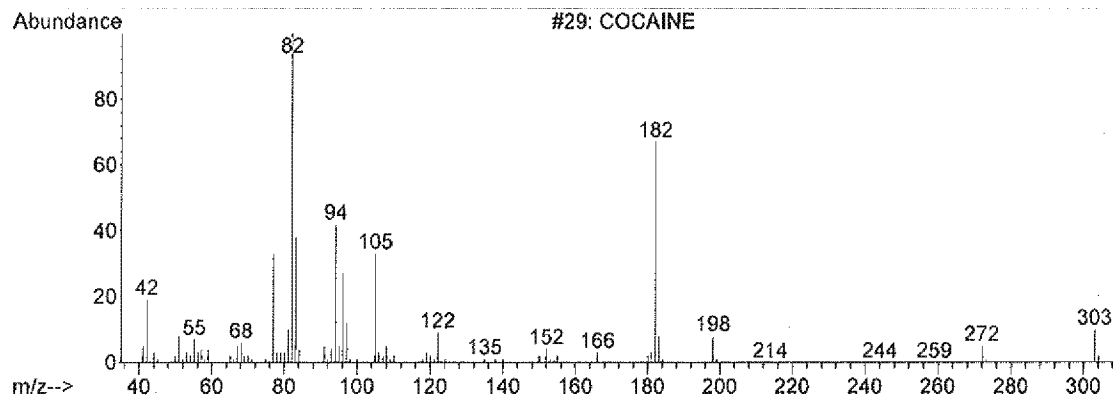
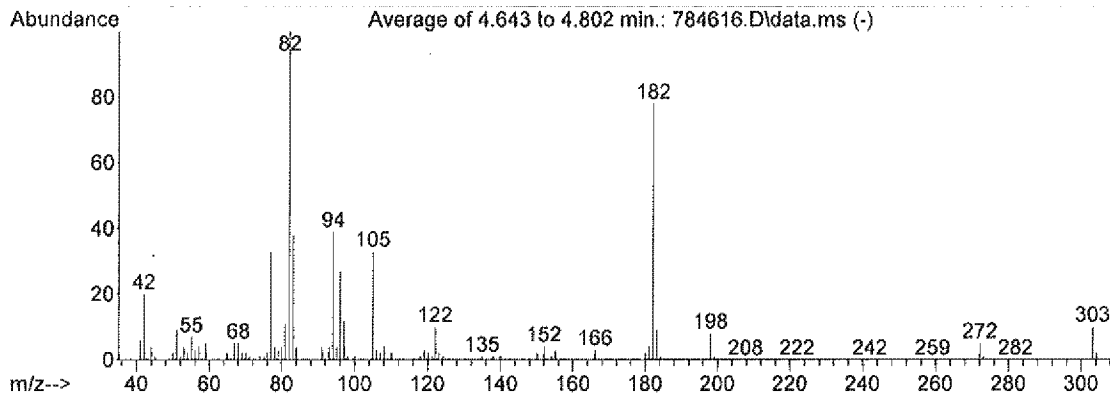
Ret. Time	Area	Area %	Ratio %
4.680	1539409	100.00	100.00

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784616.D
Operator : ASD
Date Acquired : 26 Apr 2011 12:21
Sample Name : XXXXXXXXXX
Submitted by : MGL
Vial Number : 16
AcquisitionMeth: DRUGS.M
Integrator : RTE

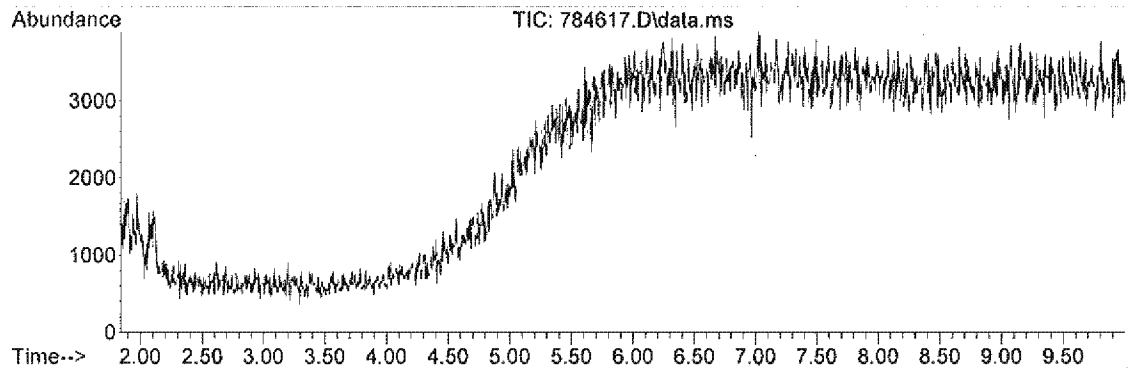
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
C:\Database\NIST05a.L Minimum Quality: 80
C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	4.68	C:\Database\SLI.L COCAINE	000050-36-2	99



Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784617.D
Operator : ASD
Date Acquired : 26 Apr 2011 12:34
Sample Name : BLANK
Submitted by : MGL
Vial Number : 1
AcquisitionMeth: WDRUGS.M
Integrator : RTE



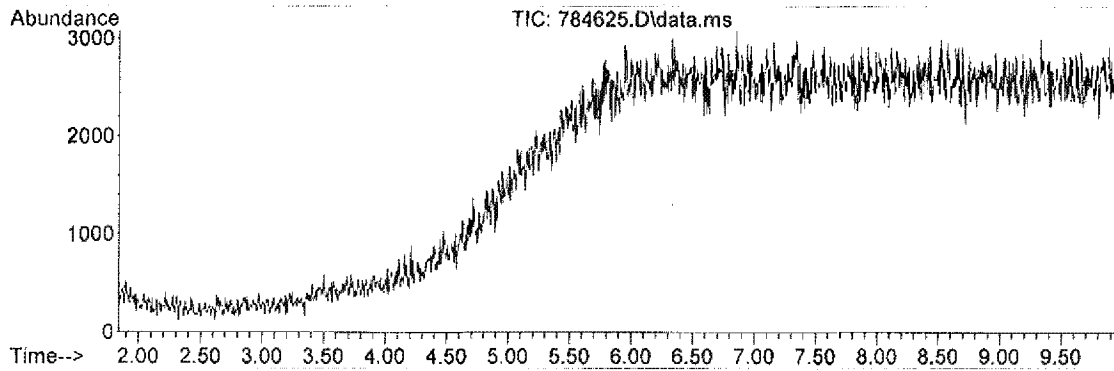
Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784625.D
Operator : ASD
Date Acquired : 26 Apr 2011 14:16
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE

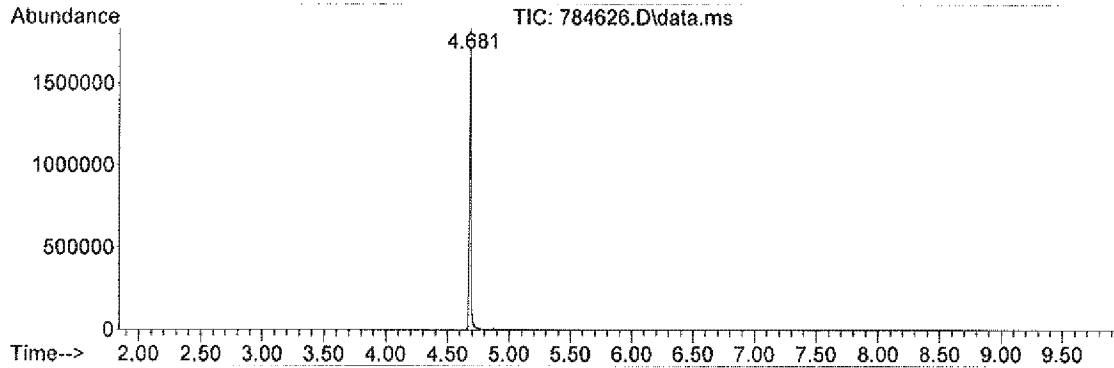


Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784626.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 14:28
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 7
 AcquisitionMeth: DRUGS.M
 Integrator : RTE



Ret. Time	Area	Area %	Ratio %
4.681	1740904	100.00	100.00

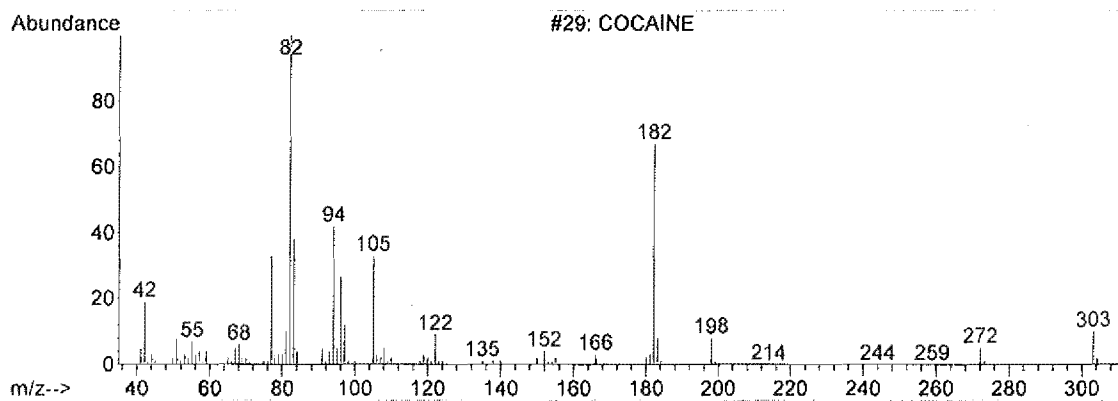
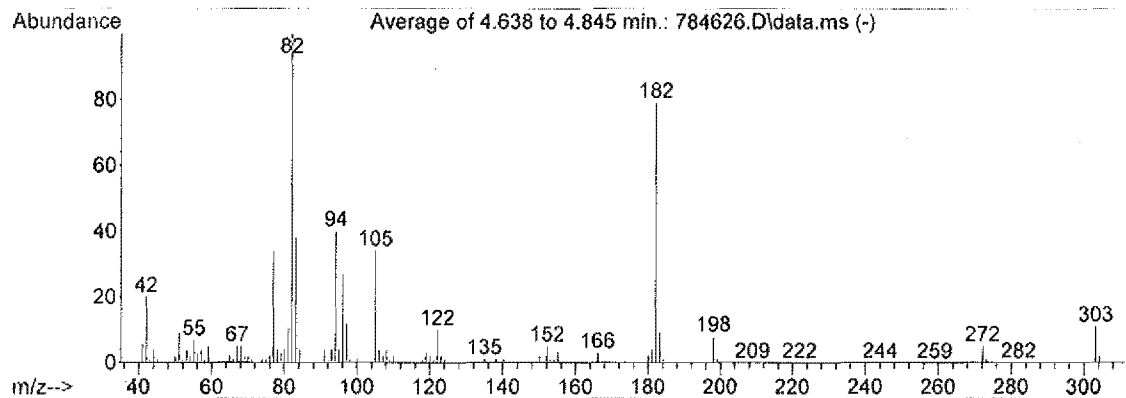
Area Percent / Library Search Report

Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784626.D
 Operator : ASD
 Date Acquired : 26 Apr 2011 14:28
 Sample Name : COCAINE STD
 Submitted by :
 Vial Number : 7
 AcquisitionMeth: DRUGS.M
 Integrator : RTE

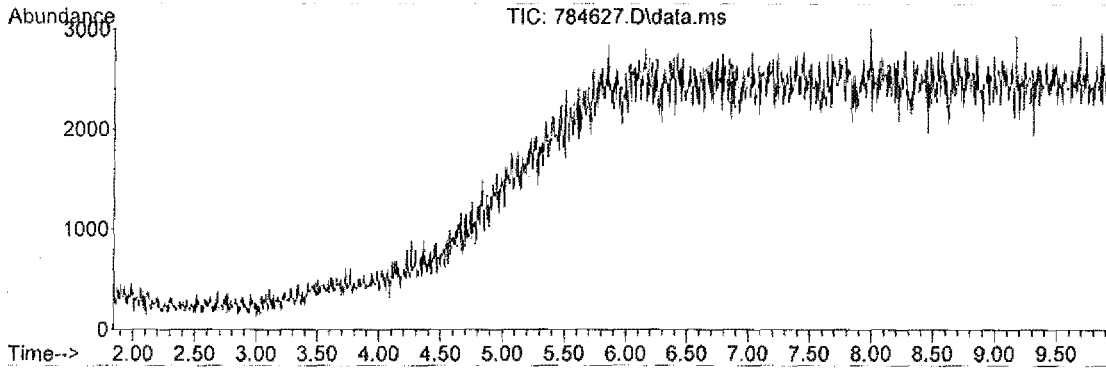
Search Libraries: C:\Database\SLI.L Minimum Quality: 80
 C:\Database\NIST05a.L Minimum Quality: 80
 C:\Database\PMW_TOX2.L

PK#	RT	Library/ID	CAS#	Qual
1	4.68	C:\Database\SLI.L COCAINE	000050-36-2	99



Information from Data File:

File Name : F:\Q2-2011\SYSTEM 7\04_26_11\784627.D
Operator : ASD
Date Acquired : 26 Apr 2011 14:41
Sample Name : BLANK
Submitted by :
Vial Number : 1
AcquisitionMeth: DRUGS.M
Integrator : RTE



Ret. Time	Area	Area %	Ratio %
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NO INTEGRATED PEAKS

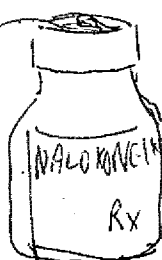
11-44-A

Pharmaceutical Analysis Sheet

Sample # B11-04572 City Haverhill E.O. weight _____

Count 1 injecta vial Description: _____

Ballistic I.D. Naloxone no breaks



intact injecta vial

Naloxone HCL

Rx class E

I.D. Source _____

Final I.D. _____ MS chemist _____ completed 4-23-11

Last page.....no further data